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Attorneys for NDK America, Inc., Foster Electric USA, Inc., JST Corporation, Nichicon (America) Corporation, Taiho Corporation of America, American Aikoku Alpha, Inc., Sagami America, Ltd., Taiho Kogyo, Ltd., SL Tennessee, LLC, Hosiden America Corporation and Samtech Corporation

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re**

**Delphi Corporation, et al.,**

Debtors.

Chapter 11

Case No. 05-44481

**MOTION FOR ORDER UNDER LOCAL BANKR. R. 2090-1(b)  
FOR ADMISSION OF GARY D. SANTELLA *PRO HAC VICE***

Joseph H. Lemkin (“Movant”), a member in good standing of the New York State Bar and an associate with Duane Morris LLP, a Delaware Limited Liability Partnership that maintains offices in New York, New Jersey and other states, hereby moves the Court to enter an order permitting Gary D. Santella, who is admitted to practice before the State Courts of Illinois and the United States District Court for the Northern District of Illinois, the U.S. District Court for the District of Arizona; U.S. District Court for the Eastern District of Michigan; U.S. Court of Appeals for the Seventh Circuit; U.S. Court of Appeals for the Ninth Circuit; and the U.S. Court of Appeals for the Federal Circuit, to practice *pro hac vice* before the United States Bankruptcy Court for the Southern District of New York to represent certain creditors pursuant to Local Bankr. R. 2090-1(b). In support of the Motion, Movant states as follows:

1. Gary D. Santella is a member in good standing of the Illinois State Bar since 1979 and also is admitted to practice before the United States District Court for the Northern District of Illinois as well as the United States Court of Appeals for the Seventh Circuit. There are no disciplinary proceedings pending against Gary D. Santella as a member of the Illinois State Bar or in any jurisdiction.

2. In support of the relief requested in this Motion, attached hereto as **Exhibit "A"** is a certificate pursuant to Local Bankr. R. 2090-1(b).

3. Movant requests that this Court approve this Motion so that Gary D. Santella may file pleadings and appear and be heard at hearings in this bankruptcy case, as counsel to NDK America, Inc., Foster Electric USA, Inc., JST Corporation, Nichicon (America) Corporation, Taiho Kogyo Co., Ltd., Taiho Corporation of America, American Aikoku Alpha, Inc., Sagami America, Ltd., SL Tennessee, LLC, Hosiden America Corporation and Samtech Corporation (the "Creditors"), as parties of interest.

4. Notice of this Motion has been provided to Debtor's counsel, Counsel for the Official Committee of Unsecured Creditors and the United States Trustee. Movant submits that given the nature of the relief requested, no other or further notice need be given.

5. No previous request for the relief sought herein has been made to this court or any other Court.

**WHEREFORE**, Movant respectfully requests that the Court enter an Order permitting Gary D. Santella to appear *pro hac vice* as counsel to Creditors in this bankruptcy case and granting such order and further relief as is just and proper.

Dated: November 10, 2005

Respectfully submitted,

By: /s/ Joseph H. Lemkin (JHL-2490)  
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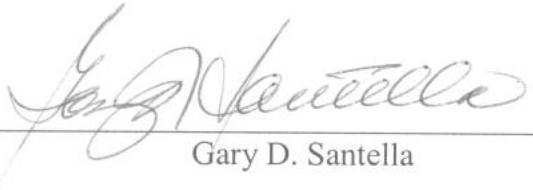
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**EXHIBIT "A"**

I certify that I am eligible for admission to this Court, am admitted to practice in the jurisdictions specified in the Motion, and am in good standing in such jurisdictions; I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course of this chapter 11 case, pursuant to Local Bankr. R. 2090-1 (b); and I have access to, or have acquired, a copy of the Local Bankruptcy Rules for the Southern District of New York and am generally familiar with such Rules.

Dated: November 10, 2005

By:

  
Gary D. Santella